

\$2527
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Electronically Filed
Nov 05 2021 11:56 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Attorneys for Plaintiff Kari Anne Johnson

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

KARI ANNE JOHNSON, an individual,
Plaintiff,

CASE NO.: CV21-00246

DEPT. NO.: 7

vs.

MICHAEL EDWARD HATCH, an individual;
ALISHA SUZANNE HATCH, an individual;
and DOES I THROUGH X, inclusive;

Defendants.

NOTICE OF CROSS-APPEAL

On October 21, 2021, Defendants Michael Edward Hatch and Alisha Suzanne Hatch filed a Notice of Appeal from the Order Regarding Attorneys' Fees and Costs entered October 1, 2021.

Plaintiff Kari Anne Johnson, by and through her counsel of record, provides notice that she cross-appeals to the Nevada Supreme Court from the District Court regarding the same order, the Order Regarding Attorneys' Fees and Costs entered October 1, 2021.

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AFFIRMATION: The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED: This 27th day of October 2021.

ROBISON, SHARP, SULLIVAN & BRUST
A Professional Corporation
71 Washington Street
Reno, Nevada 89503


KENT R. ROBISON
HANNAH E. WINSTON
Attorneys for Plaintiff Kari Anne Johnson

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of **NOTICE OF CROSS-APPEAL** on all parties to this action by the method(s) indicated below:

_____ by placing true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

X_____ by using the Court's CM/ECF Electronic Notification System addressed to:

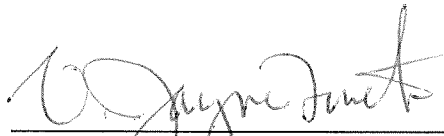
Mark G. Simons, Esq.
Anthony L. Hall, Esq.
SIMONS HALL JOHNSTON PC
Email: MSimons@SHJNevada.com
AHall@SHJNevada.com
Attorneys for Defendants

_____ by personal delivery/hand delivery addressed to:

_____ by facsimile (fax) addressed to:

_____ by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 27th day of October, 2021.



V. JAYNE FERRETTO

Employee of Robison, Sharp, Sullivan & Brust

1310
KENT R. ROBISON, ESQ. – NSB 1167
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IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

KARI ANNE JOHNSON, an individual,
Plaintiff,

CASE NO.: CV21-00246

DEPT. NO.: 7

vs.

MICHAEL EDWARD HATCH, an individual;
ALISHA SUZANNE HATCH, an individual;
and DOES I THROUGH X, inclusive;

Defendants.

CASE APPEAL STATEMENT

1. Name of Appellant filing this Case Appeal Statement: Kari Anne Johnson.
2. Judge issuing the decision, judgment or order appealed from: The Honorable Egan Walker.
3. Each Cross-Appellant and address of counsel for each:
Cross-Appellant: Kari Anne Johnson
Counsel: Kent R. Robison, Esq.
Hannah E. Winston, Esq.
71 Washington Street
Reno, Nevada 89503
4. Each Respondent and address of counsel for each:
Cross-Respondent: Michael Edward Hatch and Alisha Suzanne Hatch
Counsel: Mark G. Simons, Esq.
6490 S. McCarran Blvd., Ste. F-46
Reno, Nevada 89509

1 5. All counsel identified in paragraphs 3 and 4 are licensed to practice law in the State
2 of Nevada.

3 6. Cross-Appellant was represented by the above-named retained counsel in the
4 district court and continues to be represented by the above-named retain counsel on appeal.
5

6 7. Cross-Appellant has not been granted leave to proceed *in forma pauperis*.

7 9. Dated proceedings began in District Court: February 10, 2021.

8 10. Brief description of the nature of the action and result in the District Court,
9 including the type of judgment or order being appealed and the relief granted by the District Court:
10

11 Cross-Appellant/Plaintiff Kari Anne Johnson (“Johnson”) commenced this case due to a
12 dispute concerning a promissory note and title to real property associated therewith. Johnson
13 alleged that the parties entered an agreement wherein Johnson would loan the Defendants Michael
14 Edward Hatch and Alisha Suzann Hatch (collectively, the “Hatches”) money necessary to
15 purchase a residence pursuant to a written promissory note and that Johnson would remain on title
16 to the residence until the promissory note was repaid in full. Johnson alleged, among other things,
17 that at closing, the Hatches caused Johnson to be removed from the title to the residence through
18 fraud or forgery. Thus, Johnson asserted claims for breach of contract and fraud, among others.
19

20 The Hatches moved to dismiss Johnson’s Complaint, arguing, among other things, that the
21 statute of limitations barred Johnson’s claims because the deed to the real property was recorded
22 in 2015. The District Court held a hearing on the Defendants’ motion to dismiss and made
23 improper factual determinations that were contrary to applicable law and inappropriate under
24 Nevada Rule of Civil Procedure 12(b)(5). The District Court ultimately dismissed Johnson’s
25 Complaint for failing to include a jurisdictional statement but granted Johnson leave to file a
26 second amended complaint. Although the District Court granted Johnson leave to file a second
27 amended complaint, the District Court cautioned Plaintiff that the District Court may find there
28

1 was not a factual basis for her claims and would therefore, consider Rule 11 sanctions.

2 Given the District Court's improper findings and conclusions of law at the hearing on the
3 Hatches' motion to dismiss, Johnson voluntarily dismissed the case and filed a new action in
4 Justice Court. Thereafter, the Hatches sought attorney fees and costs under NRS 18.010(2)(b) as
5 the prevailing party. The District Court erred and awarded attorney fees and costs to the Hatches
6 even though they were not the prevailing party. Moreover, the District Court's award is not
7 supported by any evidence. This appeal follows.
8

9 11. This case has not been the subject of any prior appeals.

10 12. This appeal does not raise any question related to child custody.


11 13. Whether this appeal involves the possibility of settlement: Settlement is always
12 encouraged but given the unreasonableness in the Hatches' positions thus far, it is unlikely that
13 settlement would be possible.
14

15 **AFFIRMATION**
16 **Pursuant to NRS 239B.030**

17 The undersigned does hereby affirm that this document does not contain the social security
18 number of any person.

19 Respectfully submitted this 27th day of October, 2021.

20 ROBISON, SHARP, SULLIVAN & BRUST
21 A Professional Corporation
22 71 Washington Street
23 Reno, Nevada 89503

24 
25 KENT R. ROBISON
26 HANNAH E. WINSTON
27 *Attorneys for Kari Anne Johnson*
28

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of **CASE APPEAL STATEMENT** on all parties to this action by the method(s) indicated below:

_____ by placing true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

X by using the Court's CM/ECF Electronic Notification System addressed to:

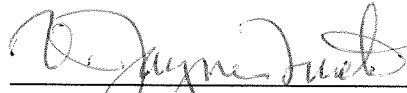
Mark G. Simons, Esq.
Anthony L. Hall, Esq.
SIMONS HALL JOHNSTON PC
Email: MSimons@SHJNevada.com
AHall@SHJNevada.com
Attorneys for Defendants

_____ by personal delivery/hand delivery addressed to:

_____ by facsimile (fax) addressed to:

_____ by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 27th day of October, 2021.



V. JAYNE FERRETTO

Employee of Robison, Sharp, Sullivan & Brust

SECOND JUDICIAL DISTRICT COURT**STATE OF NEVADA****COUNTY OF WASHOE****Case History - CV21-00246****Case Description: KARI A. JOHNSON VS MICHAEL E. HATCH ETAL (D7)****Case Number: CV21-00246 Case Type: OTHER REAL PROPERTY - Initially Filed On: 2/10/2021****Parties**

<u>Party Type & Name</u>	<u>Party Status</u>
JUDG - BARRY L. BRESLOW - D8	Party ended on: 2/11/2021 10:22:19AM
JUDG - EGAN WALKER - D7	Active
JUDG - CONNIE J. STEINHEIMER - D4	Party ended on: 3/9/2021 9:48:11AM
PLTF - KARI ANNE JOHNSON - @1225568	Active
DEFT - ALISHA SUZANNE HATCH - @1367695	Active
DEFT - MICHAEL EDWARD HATCH - @1367694	Active
ATTY - Stefanie T. Sharp, Esq. - 8661	Active
ATTY - Kent Richard Robison, Esq. - 1167	Active
ATTY - Clayton P. Brust, Esq. - 5234	Active
ATTY - Anthony L. Hall, Esq. - 5977	Active
ATTY - Mark G. Simons, Esq. - 5132	Active
ATTY - Hannah Winston, Esq. - 14520	Active

Disposed Hearings

- Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 3/9/2021 at 11:53:00
Extra Event Text: EX PARTE MOTION FOR ORDER SHORTENING TIME
Event Disposition: S200 - 3/10/2021
- Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 3/19/2021 at 14:24:00
Extra Event Text: EMERGENCY MOTION TO EXPUNGE LIS PENDENS FILED 3/05/2021
Event Disposition: S200 - 3/22/2021
- Department: D7 -- Event: MOTION ... -- Scheduled Date & Time: 3/22/2021 at 13:30:00
Extra Event Text: HEARING ON MOTION SET PER COURT ORDER
Event Disposition: D425 - 3/22/2021
- Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 3/31/2021 at 15:55:00
Extra Event Text: ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS
Event Disposition: S200 - 4/27/2021
- Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 4/8/2021 at 16:18:00
Extra Event Text: MOTION TO DISMISS VERIFIED FIRST AMENDED COMPLAINT
Event Disposition: S200 - 5/21/2021
- Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 4/12/2021 at 13:40:00
Extra Event Text: PLAINTIFF'S OBJECTION TO DEFENDANTS' PROPOSED ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS
Event Disposition: S200 - 4/27/2021
- Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 4/14/2021 at 14:05:00
Extra Event Text: MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT
Event Disposition: S200 - 5/21/2021

Report Does Not Contain Sealed Cases or Confidential Information

- 8 Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 6/10/2021 at 17:00:00
Extra Event Text: MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION OF ORDER TO SET, OR, ALTERNATIVELY, REQUEST FOR CLARIFICATION
Event Disposition: S200 - 6/29/2021
- 9 Department: D7 -- Event: MOTION ... -- Scheduled Date & Time: 7/8/2021 at 13:30:00

Event Disposition: D430 - 7/8/2021
- 10 Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 7/16/2021 at 17:00:00
Extra Event Text: ORDER ADDRESSING MOTIONS
Event Disposition: S200 - 8/2/2021
- 11 Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 9/2/2021 at 13:00:00
Extra Event Text: DEFENDANTS MOTION FOR AN AWARD FOR ATTORNEYS FEES AND COSTS FILED AUGUST 19, 2021 -
Event Disposition: S200 - 10/1/2021
- 12 Department: D7 -- Event: Request for Submission -- Scheduled Date & Time: 9/8/2021 at 15:15:00
Extra Event Text: Plaintiff's Motion to Retax Costs
Event Disposition: S200 - 10/1/2021

Actions

- | | <u>Filing Date</u> | <u>-</u> | <u>Docket Code & Description</u> |
|----|--------------------|----------|--|
| 1 | 2/10/2021 | - | \$1425 - \$Complaint - Civil
Additional Text: VERIFIED COMPLAINT - Transaction 8289076 - Approved By: YVILORIA : 02-10-2021:11:48:55 |
| 2 | 2/10/2021 | - | PAYRC - **Payment Receipted
Additional Text: A Payment of \$255.00 was made on receipt DCDC669530. |
| 3 | 2/10/2021 | - | 4090 - ** Summons Issued
Additional Text: Transaction 8289219 - Approved By: CSULEZIC : 02-10-2021:12:19:00 |
| 4 | 2/10/2021 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 8289229 - Approved By: NOREVIEW : 02-10-2021:12:20:01 |
| 5 | 2/10/2021 | - | 1935 - Lis Pendens
Additional Text: Notice of Pendency of Action (Lis Pendens) - Transaction 8289494 - Approved By: NOREVIEW : 02-10-2021:13:28:58 |
| 6 | 2/10/2021 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 8289505 - Approved By: NOREVIEW : 02-10-2021:13:30:07 |
| 7 | 2/11/2021 | - | 3161 - Ord of Recusal
Additional Text: Transaction 8291148 - Approved By: NOREVIEW : 02-11-2021:10:19:52 |
| 8 | 2/11/2021 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 8291154 - Approved By: NOREVIEW : 02-11-2021:10:20:46 |
| 9 | 2/11/2021 | - | 1312 - Case Assignment Notification
Additional Text: RANDOMLY REASSIGNED TO D4 FROM D8 PER ORDER OF RECUSAL FILED 2/11/21 - Transaction 8291192 - Approved By: NOREVIEW : 02-11-2021:10:33:54 |
| 10 | 2/11/2021 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 8291198 - Approved By: NOREVIEW : 02-11-2021:10:34:49 |

- 11 2/19/2021 - 4085 - Summons Filed
Additional Text: Summons Filed (Defendant Michael Edward Hatch) - 2/17/2021 Transaction 8303151 - Approved By: NOREVIEW : 02-19-2021:11:09:41
- 12 2/19/2021 - 4085 - Summons Filed
Additional Text: Summons Filed (Alisha Suzanne Hatch - 2/17/2021 Transaction 8303159 - Approved By: NOREVIEW : 02-19-2021:11:12:41
- 13 2/19/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8303155 - Approved By: NOREVIEW : 02-19-2021:11:10:33
- 14 2/19/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8303161 - Approved By: NOREVIEW : 02-19-2021:11:13:33
- 15 3/4/2021 - 2520 - Notice of Appearance
Additional Text: MARK SIMONS OBO MICHAEL & ALISHA HATCH - Transaction 8325975 - Approved By: CSULEZIC : 03-04-2021:14:33:45
- 16 3/4/2021 - \$1560 - \$Def 1st Appearance - CV
Additional Text: MICHAEL HATCH - Transaction 8325975 - Approved By: CSULEZIC : 03-04-2021:14:33:45
- 17 3/4/2021 - \$DEFT - \$Addl Def/Answer - Prty/Appear
Additional Text: ALISHA HATCH - Transaction 8325975 - Approved By: CSULEZIC : 03-04-2021:14:33:45
- 18 3/4/2021 - \$3375 - \$Peremptory Challenge
Additional Text: FILED ERRONEOUSLY PER CONVERSATION WITH ATTORNEY MARK SIMONS, ESQ.-
Transaction 8326042 - Approved By: CSULEZIC : 03-04-2021:14:42:53
- 19 3/4/2021 - PAYRC - **Payment Receipted
Additional Text: A Payment of \$238.00 was made on receipt DCDC670502.
- 20 3/4/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8326031 - Approved By: NOREVIEW : 03-04-2021:14:34:40
- 21 3/4/2021 - PAYRC - **Payment Receipted
Additional Text: A Payment of \$450.00 was made on receipt DCDC670503.
- 22 3/4/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8326067 - Approved By: NOREVIEW : 03-04-2021:14:43:50
- 23 3/5/2021 - 2490 - Motion ...
Additional Text: EMERGENCY MOTION TO EXPUNGE LIS PENDENS - Transaction 8328090 - Approved By: YVILORIA : 03-05-2021:14:28:54
- 24 3/5/2021 - 3845 - Request for Hearing
Additional Text: REQUEST FOR HEARING PURSUANT TO NRS 14.015 - Transaction 8328090 - Approved By: YVILORIA : 03-05-2021:14:28:54
- 25 3/5/2021 - 2315 - Mtn to Dismiss ...
Additional Text: Transaction 8328090 - Approved By: YVILORIA : 03-05-2021:14:28:54
- 26 3/5/2021 - 1670 - Ex-Parte Mtn...
Additional Text: EX PARTE MOTION FOR ORDER SHORTENING TIME - Transaction 8328090 - Approved By: YVILORIA : 03-05-2021:14:28:54
- 27 3/5/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8328216 - Approved By: NOREVIEW : 03-05-2021:14:30:05

- 28 3/8/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO EX PARTE MOTION FOR ORDER SHORTENING TIME - Transaction 8331505 - Approved By: CSULEZIC : 03-09-2021:08:19:09
- 29 3/9/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8331818 - Approved By: NOREVIEW : 03-09-2021:08:20:10
- 30 3/9/2021 - CHECK - **Trust Disbursement
Additional Text: A Disbursement of \$450.00 on Check Number 12265
- 31 3/9/2021 - 3161 - Ord of Recusal
Additional Text: ORDER OF RECUSAL AND FOR RANDOM REASSIGNMENT - Transaction 8332105 - Approved By: NOREVIEW : 03-09-2021:09:39:51
- 32 3/9/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8332106 - Approved By: NOREVIEW : 03-09-2021:09:40:42
- 33 3/9/2021 - 1312 - Case Assignment Notification
Additional Text: RANDOMLY REASSIGNED TO D7 FROM D4 PER ORDER OF RECUSAL FILED 3/9/21 - Transaction 8332162 - Approved By: NOREVIEW : 03-09-2021:09:51:35
- 34 3/9/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8332166 - Approved By: NOREVIEW : 03-09-2021:09:52:22
- 35 3/9/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF EX PARTE MOTION FOR ORDER SHORTENING TIME - Transaction 8332687 - Approved By: SACORDAG : 03-09-2021:11:50:15
- 36 3/9/2021 - 3860 - Request for Submission
Additional Text: Transaction 8332687 - Approved By: SACORDAG : 03-09-2021:11:50:15
DOCUMENT TITLE: EX PARTE MOTION FOR ORDER SHORTENING TIME
PARTY SUBMITTING: MARK SIMONS, ESQ
DATE SUBMITTED: 03/09/2021
SUBMITTED BY: SJA
DATE RECEIVED JUDGE OFFICE:
- 37 3/9/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8332728 - Approved By: NOREVIEW : 03-09-2021:11:51:06
- 38 3/9/2021 - 2665 - Ord Accepting Reassignment
Additional Text: Transaction 8333170 - Approved By: NOREVIEW : 03-09-2021:13:56:27
- 39 3/9/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8333175 - Approved By: NOREVIEW : 03-09-2021:13:57:30
- 40 3/10/2021 - 3242 - Ord Setting Hearing
Additional Text: Transaction 8335953 - Approved By: NOREVIEW : 03-10-2021:14:24:17
- 41 3/10/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 42 3/10/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8335956 - Approved By: NOREVIEW : 03-10-2021:14:25:16
- 43 3/11/2021 - 2550 - Notice of Hearing
Additional Text: Transaction 8337328 - Approved By: NOREVIEW : 03-11-2021:10:22:47

- 44 3/11/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8337331 - Approved By: NOREVIEW : 03-11-2021:10:23:36
- 45 3/12/2021 - 2520 - Notice of Appearance
Additional Text: HANNAH WINSTON, ESQ FOR PLTF - Transaction 8339788 - Approved By: SACORDAG : 03-12-2021:11:55:26
- 46 3/12/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8339836 - Approved By: NOREVIEW : 03-12-2021:11:56:20
- 47 3/12/2021 - JF - **First Day Jury Fees Deposit
Additional Text: Transaction 8340230 - Approved By: YVILORIA : 03-12-2021:13:35:30
- 48 3/12/2021 - 1580 - Demand for Jury
Additional Text: PLTF KARI ANNE JOHNSON - Transaction 8340230 - Approved By: YVILORIA : 03-12-2021:13:35:30
- 49 3/12/2021 - PAYRC - **Payment Receipted
Additional Text: A Payment of \$320.00 was made on receipt DCDC670968.
- 50 3/12/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8340319 - Approved By: NOREVIEW : 03-12-2021:13:36:34
- 51 3/15/2021 - 4105 - Supplemental ...
Additional Text: SUPPLEMENT TO EMERGENCY MOTION TO EXPUNGE LIS PENDENS - Transaction 8342029 - Approved By: NOREVIEW : 03-15-2021:10:44:47
- 52 3/15/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8342030 - Approved By: NOREVIEW : 03-15-2021:10:45:37
- 53 3/16/2021 - 1090 - Amended Complaint
Additional Text: VERIFIED FIRST AMENDED COMPLAINT - Transaction 8345017 - Approved By: SACORDAG : 03-16-2021:13:41:17
- 54 3/16/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO MOTION TO DISMISS - Transaction 8345041 - Approved By: SACORDAG : 03-16-2021:13:43:02
- 55 3/16/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO EMERGENCY MOTION TO EXPUNGE LIS PENDENS - Transaction 8345088 - Approved By: SACORDAG : 03-16-2021:13:44:34
- 56 3/16/2021 - 1030 - Affidavit in Support...
Additional Text: NOTICE OF STRICKEN DOCUMENT
The Clerk of the Court hereby strikes the AFFIDAVIT IN SUPPORT filed by STEFANIE SHARP, ESQ on 03/16/2021 from the case for the following reason(s):
-Document does not have an Affirmation

Transaction 8345093 - Approved By: NOREVIEW : 03-16-2021:12:35:19
- 57 3/16/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8345098 - Approved By: NOREVIEW : 03-16-2021:12:36:18
- 58 3/16/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8345371 - Approved By: NOREVIEW : 03-16-2021:13:42:28
- 59 3/16/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8345379 - Approved By: NOREVIEW : 03-16-2021:13:44:21
- 60 3/16/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8345388 - Approved By: NOREVIEW : 03-16-2021:13:45:39

- 61 3/17/2021 - 2610 - Notice ...
Additional Text: NOTICE OF STRICKEN DOCUMENT RE: DOCKET 1030 FILED 03/16/2021; MISSING AFFIRMATION - Transaction 8346597
- Approved By: SACORDAG : 03-17-2021:09:13:59
- 62 3/17/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8346622 - Approved By: NOREVIEW : 03-17-2021:09:15:08
- 63 3/17/2021 - 1030 - Affidavit in Support...
Additional Text: AFFIDAVIT OF KARI ANNE JOHNSON IN SUPPORT OF OPPOSITION TO EMERGENCY MOTION TO EXPUNGE LIS
PENDENS - Transaction 8346737 - Approved By: NOREVIEW : 03-17-2021:09:43:48
- 64 3/17/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8346743 - Approved By: NOREVIEW : 03-17-2021:09:44:48
- 65 3/17/2021 - 2610 - Notice ...
Additional Text: Proposed Exhibits Submitted by Plaintiff For March 22, 2021 Hearing - Transaction 8347328 - Approved By:
SACORDAG : 03-17-2021:13:01:16
- 66 3/17/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8347440 - Approved By: NOREVIEW : 03-17-2021:13:02:09
- 67 3/19/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF EMERGENCY MOTION TO EXPUNGE LIS PENDENS - Transaction 8352115 - Approved By:
CSULEZIC : 03-19-2021:14:34:43
- 68 3/19/2021 - 3860 - Request for Submission
Additional Text: - Transaction 8352115 - Approved By: CSULEZIC : 03-19-2021:14:34:43
DOCUMENT TITLE: EMERGENCY MOTION TO EXPUNGE LIS PENDENS FILED 3/05/2021
PARTY SUBMITTING: MARK SIMONS ESQ
DATE SUBMITTED: 3/19/2021
SUBMITTED BY: CS
DATE RECEIVED JUDGE OFFICE:
- 69 3/19/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8352149 - Approved By: NOREVIEW : 03-19-2021:14:36:41
- 70 3/22/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 71 3/24/2021 - 4185 - Transcript
Additional Text: HEARING - MARCH 22, 2021 - Transaction 8359691 - Approved By: NOREVIEW : 03-24-2021:16:40:36
- 72 3/24/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8359704 - Approved By: NOREVIEW : 03-24-2021:16:41:52
- 73 3/25/2021 - 2490 - Motion ...
Additional Text: Motion for Leave to File Second Amended Complaint - Transaction 8361222 - Approved By: SACORDAG :
03-25-2021:14:09:11
- 74 3/25/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8361254 - Approved By: NOREVIEW : 03-25-2021:14:10:14
- 75 3/30/2021 - 2315 - Mtn to Dismiss ...
Additional Text: MOTION TO DISMISS FIRST AMENDED COMPLAINT - Transaction 8368951 - Approved By: SACORDAG :
03-30-2021:16:12:29
- 76 3/30/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8369044 - Approved By: NOREVIEW : 03-30-2021:16:13:24

- 77 3/31/2021 - 3860 - Request for Submission
Additional Text: Transaction 8371068 - Approved By: NOREVIEW : 03-31-2021:15:12:20
DOCUMENT TITLE: ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS
PARTY SUBMITTING: MARK SIMONS, ESQ
DATE SUBMITTED: 03/31/2021
SUBMITTED BY: SJA
DATE RECEIVED JUDGE OFFICE:
- 78 3/31/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8371086 - Approved By: NOREVIEW : 03-31-2021:15:14:59
- 79 4/1/2021 - 2630 - Objection to ...
Additional Text: PLAINTIFF'S OBJECTION TO DEFENDANTS' PROPOSED ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS - Transaction 8373553 - Approved By: CSULEZIC : 04-01-2021:15:06:32
- 80 4/1/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8373587 - Approved By: NOREVIEW : 04-01-2021:15:07:27
- 81 4/8/2021 - 2645 - Opposition to Mtn ...
Additional Text: Opposition to Motion to Dismiss Verified First Amended Complaint - Transaction 8385069 - Approved By: SACORDAG : 04-08-2021:11:45:31
- 82 4/8/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8385075 - Approved By: NOREVIEW : 04-08-2021:11:46:35
- 83 4/8/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT - Transaction 8386192 - Approved By: SACORDAG : 04-08-2021:16:15:58
- 84 4/8/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF MOTION TO DISMISS VERIFIED FIRST AMENDED COMPLAINT - Transaction 8386192 - Approved By: SACORDAG : 04-08-2021:16:15:58
- 85 4/8/2021 - 3860 - Request for Submission
Additional Text: Transaction 8386192 - Approved By: SACORDAG : 04-08-2021:16:15:58
DOCUMENT TITLE: MOTION TO DISMISS VERIFIED FIRST AMENDED COMPLAINT
PARTY SUBMITTING: MARK SIMONS, ESQ
DATE SUBMITTED: 04/08/2021
SUBMITTED BY: SJA
DATE RECEIVED JUDGE OFFICE:
- 86 4/8/2021 - 3880 - Response...
Additional Text: DFX: EXHIBITS PRESENTED INCORRECTLY

DEFENDANTS' RESPONSE TO PLAINTIFF'S OBJECTION TO DEFENDANTS' PROPOSED ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS - Transaction 8386192 - Approved By: SACORDAG : 04-08-2021:16:15:58
- 87 4/8/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8386277 - Approved By: NOREVIEW : 04-08-2021:16:16:59
- 88 4/12/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF PLAINTIFF'S OBJECTION TO DEFENDANTS' PROPOSED ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS - Transaction 8390195 - Approved By: SACORDAG : 04-12-2021:13:56:25
- 89 4/12/2021 - 3860 - Request for Submission
Additional Text: REQUEST FOR SUBMISSION OF PLAINTIFF'S OBJECTION TO DEFENDANTS' PROPOSED ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS - Transaction 8390224 - Approved By: NOREVIEW : 04-12-2021:13:43:54
DOCUMENT TITLE: PLAINTIFF'S OBJECTION TO DEFENDANTS' PROPOSED ORDER GRANTING MOTION TO EXPUNGE LIS PENDENS
PARTY SUBMITTING: STEFANIE SHARP, ESQ.
DATE SUBMITTED: 4/12/21
SUBMITTED BY: NM
DATE RECEIVED JUDGE OFFICE:

- 90 4/12/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8390230 - Approved By: NOREVIEW : 04-12-2021:13:44:53
- 91 4/12/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8390286 - Approved By: NOREVIEW : 04-12-2021:14:00:31
- 92 4/14/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT - Transaction 8394845 -
Approved By: YVILORIA : 04-14-2021:14:25:34
- 93 4/14/2021 - 3860 - Request for Submission
Additional Text: Transaction 8394860 - Approved By: NOREVIEW : 04-14-2021:14:01:36
DOCUMENT TITLE: MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT
PARTY SUBMITTING: STEFANIE SHARP. ESQ
DATE SUBMITTED: 04/14/2021
SUBMITTED BY: SJA
DATE RECEIVED JUDGE OFFICE:
- 94 4/14/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8394862 - Approved By: NOREVIEW : 04-14-2021:14:02:35
- 95 4/14/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8394961 - Approved By: NOREVIEW : 04-14-2021:14:26:41
- 96 4/27/2021 - 3060 - Ord Granting Mtn ...
Additional Text: TO EXPUNGE LIS PENDENS - Transaction 8414094 - Approved By: NOREVIEW : 04-27-2021:09:14:49
- 97 4/27/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 98 4/27/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 99 4/27/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8414099 - Approved By: NOREVIEW : 04-27-2021:09:15:48
- 100 4/27/2021 - 2540 - Notice of Entry of Ord
Additional Text: Transaction 8414919 - Approved By: NOREVIEW : 04-27-2021:11:40:46
- 101 4/27/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8414927 - Approved By: NOREVIEW : 04-27-2021:11:41:40
- 102 4/28/2021 - 2610 - Notice ...
Additional Text: NOTICE OF RELEASE OF LIS PENDENS - Transaction 8418281 - Approved By: CSULEZIC : 04-28-2021:15:01:07
- 103 4/28/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8418527 - Approved By: NOREVIEW : 04-28-2021:15:02:14
- 104 5/21/2021 - 3347 - Ord to Set
Additional Text: Transaction 8458984 - Approved By: NOREVIEW : 05-21-2021:17:15:06
- 105 5/21/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 106 5/21/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.

- 107 5/21/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8458989 - Approved By: NOREVIEW : 05-21-2021:17:16:06
- 108 5/25/2021 - 2490 - Motion ...
Additional Text: PLAINTIFF'S MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION OF ORDER TO SET OR, ALTERNATIVELY, REQUEST FOR CLARIFICATION OF ORDER TO SET - Transaction 8463673 - Approved By: SACORDAG : 05-26-2021:07:20:25
- 109 5/26/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8463904 - Approved By: NOREVIEW : 05-26-2021:07:21:14
- 110 6/1/2021 - 2550 - Notice of Hearing
Additional Text: Transaction 8472815 - Approved By: NOREVIEW : 06-01-2021:16:02:10
- 111 6/1/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8472827 - Approved By: NOREVIEW : 06-01-2021:16:03:13
- 112 6/8/2021 - MIN - ***Minutes
Additional Text: 03/22/21 MOTION HRG - Transaction 8484718 - Approved By: NOREVIEW : 06-08-2021:12:51:48
- 113 6/8/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8484719 - Approved By: NOREVIEW : 06-08-2021:12:52:48
- 114 6/8/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION OF ORDER TO SET, OR ALTERNATIVELY, REQUEST FOR CLARIFICATION TO SET - Transaction 8485363 - Approved By: YVILORIA : 06-08-2021:15:19:35
- 115 6/8/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8485375 - Approved By: NOREVIEW : 06-08-2021:15:20:34
- 116 6/10/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION OF ORDER TO SET, OR, ALTERNATIVELY, REQUEST FOR CLARIFICATION OF ORDER TO SET - Transaction 8490423 - Approved By: YVILORIA : 06-11-2021:08:15:02
- 117 6/10/2021 - 3860 - Request for Submission
Additional Text: Transaction 8490434 - Approved By: NOREVIEW : 06-10-2021:16:47:06
DOCUMENT TITLE: MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION OF ORDER TO SET, OR, ALTERNATIVELY, REQUEST FOR CLARIFICATION OF ORDER TO SET
PARTY SUBMITTING: STEFANIE SHARP, ESQ
DATE SUBMITTED: 06/10/2021
SUBMITTED BY: SJA
DATE RECEIVED JUDGE OFFICE:
- 118 6/10/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8490447 - Approved By: NOREVIEW : 06-10-2021:16:48:09
- 119 6/11/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8490832 - Approved By: NOREVIEW : 06-11-2021:08:16:01
- 120 6/23/2021 - 3870 - Request
Additional Text: REQUEST FOR JUDICIAL NOTICE - Transaction 8509309 - Approved By: SACORDAG : 06-23-2021:13:07:57
- 121 6/23/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8509364 - Approved By: NOREVIEW : 06-23-2021:13:10:37
- 122 6/29/2021 - 3370 - Order ...
Additional Text: ORDER REGARDING COURT'S ORDER TO SET - Transaction 8517267 - Approved By: NOREVIEW : 06-29-2021:09:02:44

- 123 6/29/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 124 6/29/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8517270 - Approved By: NOREVIEW : 06-29-2021:09:03:44
- 125 7/6/2021 - 3870 - Request
Additional Text: FOR JUDICIAL NOTICE RE: NOTARY PUBLIC DOCS AND SIGNATURES - Transaction 8528910 - Approved By: NMASON : 07-06-2021:16:29:19
- 126 7/6/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8528998 - Approved By: NOREVIEW : 07-06-2021:16:31:48
- 127 7/7/2021 - 2650 - Opposition to ...
Additional Text: OPPOSITION TO REQUEST FOR JUDICIAL NOTICE - Transaction 8531993 - Approved By: YVILORIA : 07-07-2021:16:52:43
- 128 7/7/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8532065 - Approved By: NOREVIEW : 07-07-2021:16:53:43
- 129 7/14/2021 - MIN - ***Minutes
Additional Text: MOTIONS HEARING - 07-08-2021 - Transaction 8542632 - Approved By: NOREVIEW : 07-14-2021:11:19:43
- 130 7/14/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8542639 - Approved By: NOREVIEW : 07-14-2021:11:20:42
- 131 7/16/2021 - 3860 - Request for Submission
Additional Text: Transaction 8548146 - Approved By: NOREVIEW : 07-16-2021:15:42:18
DOCUMENT TITLE: ORDER ADDRESSING MOTIONS
PARTY SUBMITTING: S. SHARP, ESQ
DATE SUBMITTED: 07/16/2021
SUBMITTED BY: SJA
DATE RECEIVED JUDGE OFFICE:
- 132 7/16/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8548153 - Approved By: NOREVIEW : 07-16-2021:15:43:21
- 133 7/22/2021 - 4185 - Transcript
Additional Text: HEARING - JULY 8, 2021 - Transaction 8555978 - Approved By: NOREVIEW : 07-22-2021:08:30:43
- 134 7/22/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8555980 - Approved By: NOREVIEW : 07-22-2021:08:31:40
- 135 8/2/2021 - 3370 - Order ...
Additional Text: ADDRESSING MOTIONS - Transaction 8571993 - Approved By: NOREVIEW : 08-02-2021:08:18:46
- 136 8/2/2021 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 137 8/2/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8571996 - Approved By: NOREVIEW : 08-02-2021:08:19:48
- 138 8/2/2021 - 2540 - Notice of Entry of Ord
Additional Text: Transaction 8572057 - Approved By: NOREVIEW : 08-02-2021:08:39:48
- 139 8/2/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8572063 - Approved By: NOREVIEW : 08-02-2021:08:41:08

- 140 8/12/2021 - 2585 - Notice of Voluntary Dismissal
Additional Text: Transaction 8592726 - Approved By: NOREVIEW : 08-12-2021:13:41:36
- 141 8/12/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8592729 - Approved By: NOREVIEW : 08-12-2021:13:42:26
- 142 8/13/2021 - F100 - Voluntary Dismissals
No additional text exists for this entry.
- 143 8/19/2021 - 1950 - Memorandum of Costs
Additional Text: Transaction 8604551 - Approved By: NOREVIEW : 08-19-2021:13:27:52
- 144 8/19/2021 - 2010 - Mtn for Attorney's Fee
Additional Text: Transaction 8604551 - Approved By: NOREVIEW : 08-19-2021:13:27:52
- 145 8/19/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8604563 - Approved By: NOREVIEW : 08-19-2021:13:31:07
- 146 8/20/2021 - 2430 - Mtn to Retax Costs
Additional Text: Transaction 8606734 - Approved By: NOREVIEW : 08-20-2021:14:01:22
- 147 8/20/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8606741 - Approved By: NOREVIEW : 08-20-2021:14:02:44
- 148 8/27/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO MOTION FOR AN AWARD OF ATTORNEY'S FEES AND COSTS - Transaction 8618823 - Approved By: NMASON : 08-27-2021:15:41:16
- 149 8/27/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8618847 - Approved By: NOREVIEW : 08-27-2021:15:42:14
- 150 9/2/2021 - 2645 - Opposition to Mtn ...
Additional Text: OPPOSITION TO MOTION TO RETAX - Transaction 8628149 - Approved By: YVILORIA : 09-02-2021:13:11:37
- 151 9/2/2021 - 3795 - Reply...
Additional Text: REPLY IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND COSTS - Transaction 8628149 - Approved By: YVILORIA : 09-02-2021:13:11:37
- 152 9/2/2021 - 3860 - Request for Submission
Additional Text: Transaction 8628149 - Approved By: YVILORIA : 09-02-2021:13:11:37
DOCUMENT TITLE: DEFENDANTS MOTION FOR AN AWARD FOR ATTORNEYS FEES AND COSTS FILED AUGUST 19, 2021
PARTY SUBMITTING: MARK SIMONS ESQ
DATE SUBMITTED: 9-2-21
SUBMITTED BY: YV
DATE RECEIVED JUDGE OFFICE:
- 153 9/2/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8628176 - Approved By: NOREVIEW : 09-02-2021:13:12:53
- 154 9/8/2021 - 3795 - Reply...
Additional Text: Reply to Opposition to Motion to Retax Costs - Transaction 8635992 - Approved By: SACORDAG : 09-08-2021:15:13:25
- 155 9/8/2021 - 3860 - Request for Submission

Additional Text: Transaction 8636009 - Approved By: NOREVIEW : 09-08-2021:15:09:05

DOCUMENT TITLE: Plaintiff's Motion to Retax Costs

PARTY SUBMITTING: STEFANIE SHARP, ESQ

DATE SUBMITTED: 09/08/2021

SUBMITTED BY: SJA

DATE RECEIVED JUDGE OFFICE:

156 9/8/2021 - NEF - Proof of Electronic Service

Additional Text: Transaction 8636011 - Approved By: NOREVIEW : 09-08-2021:15:10:05

157 9/8/2021 - NEF - Proof of Electronic Service

Additional Text: Transaction 8636027 - Approved By: NOREVIEW : 09-08-2021:15:14:30

158 10/1/2021 - 3060 - Ord Granting Mtn ...

Additional Text: FOR FEES AND COSTS - Transaction 8677342 - Approved By: NOREVIEW : 10-01-2021:13:52:51

159 10/1/2021 - S200 - Request for Submission Complet

No additional text exists for this entry.

160 10/1/2021 - S200 - Request for Submission Complet

No additional text exists for this entry.

161 10/1/2021 - NEF - Proof of Electronic Service

Additional Text: Transaction 8677350 - Approved By: NOREVIEW : 10-01-2021:13:56:03

162 10/5/2021 - 2520 - Notice of Appearance

Additional Text: KENT ROBISON, ESQ FOR PLTF - Transaction 8682330 - Approved By: SACORDAG : 10-05-2021:15:39:20

163 10/5/2021 - NEF - Proof of Electronic Service

Additional Text: Transaction 8682521 - Approved By: NOREVIEW : 10-05-2021:15:50:44

164 10/21/2021 - 2540 - Notice of Entry of Ord

Additional Text: Transaction 8709908 - Approved By: SACORDAG : 10-21-2021:13:50:14

165 10/21/2021 - 1310 - Case Appeal Statement

Additional Text: Transaction 8709908 - Approved By: SACORDAG : 10-21-2021:13:50:14

166 10/21/2021 - \$2515 - \$Notice/Appeal Supreme Court

Additional Text: Transaction 8709908 - Approved By: SACORDAG : 10-21-2021:13:50:14

167 10/21/2021 - PAYRC - **Payment Receipted

Additional Text: A Payment of \$24.00 was made on receipt DCDC681788.

168 10/21/2021 - NEF - Proof of Electronic Service

Additional Text: Transaction 8710270 - Approved By: NOREVIEW : 10-21-2021:13:51:19

169 10/22/2021 - SAB - **Supreme Court Appeal Bond

Additional Text: MICHAEL & ALISHA HATCH - Transaction 8711676 - Approved By: YVILORIA : 10-22-2021:10:34:31

170 10/22/2021 - PAYRC - **Payment Receipted

Additional Text: A Payment of \$500.00 was made on receipt DCDC681829.

171 10/22/2021 - NEF - Proof of Electronic Service

Additional Text: Transaction 8711698 - Approved By: NOREVIEW : 10-22-2021:10:35:26

- 172 10/25/2021 - 1350 - Certificate of Clerk
Additional Text: CERTIFICATE OF CLERK AND TRANSMITTAL - NOTICE OF APPEAL - Transaction 8714529 - Approved By: NOREVIEW : 10-25-2021:13:32:13
- 173 10/25/2021 - 4113 - District Ct Deficiency Notice
Additional Text: NOTICE OF APPEAL DEFICIENCY NOTICE - SUPREME COURT FILING FEE - Transaction 8714529 - Approved By: NOREVIEW : 10-25-2021:13:32:13
- 174 10/25/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8714533 - Approved By: NOREVIEW : 10-25-2021:13:33:11
- 175 10/27/2021 - 1311 - Case Appeal Stmt-Cross Appeal
Additional Text: Transaction 8719904 - Approved By: YVILORIA : 10-27-2021:15:30:31
- 176 10/27/2021 - \$2527 - \$Notice of Cross Appeal
Additional Text: Transaction 8719904 - Approved By: YVILORIA : 10-27-2021:15:30:31
- 177 10/27/2021 - SAB - **Supreme Court Appeal Bond
Additional Text: KARI A JOHNSON - Transaction 8719932 - Approved By: YVILORIA : 10-27-2021:15:33:46
- 178 10/27/2021 - 2547 - Notice of Filing Costs/Appeal
Additional Text: NOTICE OF POSTING SECURITY BOND ON CROSS-APPEAL - Transaction 8719932 - Approved By: YVILORIA : 10-27-2021:15:33:46
- 179 10/27/2021 - PAYRC - **Payment Receipted
Additional Text: A Payment of \$34.00 was made on receipt DCDC682085.
- 180 10/27/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8719973 - Approved By: NOREVIEW : 10-27-2021:15:33:57
- 181 10/27/2021 - PAYRC - **Payment Receipted
Additional Text: A Payment of \$500.00 was made on receipt DCDC682086.
- 182 10/27/2021 - NEF - Proof of Electronic Service
Additional Text: Transaction 8719996 - Approved By: NOREVIEW : 10-27-2021:15:37:17
- 183 10/28/2021 - 1187 - **Supreme Court Case No. ...
Additional Text: SCN 83692 - HATCH
- 184 10/28/2021 - 1350 - Certificate of Clerk
Additional Text: CERTIFICATE OF CLERK AND TRANSMITTAL - NOTICE OF CROSS-APPEAL - Transaction 8722716 - Approved By: NOREVIEW : 10-28-2021:16:33:53
- 185 10/28/2021 - 4113 - District Ct Deficiency Notice
Additional Text: NOTICE OF CROSS-APPEAL DEFICIENCY - SUPREME COURT FILING FEE - Transaction 8722716 - Approved By: NOREVIEW : 10-28-2021:16:33:53

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

KARI ANNE JOHNSON,

Plaintiff,

Case No.: CV21-00246

vs.

Dept. No.: 7

MICHAEL EDWARD HATCH, an
individual; ALISHA SUZANNE
HATCH, an individual; and DOES
1-X, inclusive,

Defendants.
_____ /

ORDER REGARDING ATTORNEYS' FEES AND COSTS

Presently before the Court is Defendant's *Motion for an Award of Attorneys' Fees and Costs* ("the Motion"). Defendants MICHAEL EDWARD HATCH and ALISHA SUZANNE HATCH ("Defendants") filed the Motion on August 19, 2021. Plaintiff KARI ANNE JOHNSON ("Plaintiff") filed *Opposition to Motion for an Award of Attorneys' Fees and Costs* ("the Opposition") on August 27, 2021. Defendants filed *Reply in Support of Motion for Attorneys' Fees and Costs* on September 2, 2021, and contemporaneously submitted the Motion for the Court's consideration. Also before the Court is Plaintiffs *Motion to Retax Costs* ("Motion to Retax") filed on August 20, 2021. Defendants filed *Opposition to Motion to Retax* on September 2, 2021. Plaintiffs filed *Reply to Opposition to Motion to Retax Costs* on

1 September 8, 2021, and contemporaneously submitted the Motion to Retax for the
2 Courts review.

3 Having reviewed all the pleadings and related documents, the Court finds
4 and orders as follows:

5 This case involves a lis pendens attached to the Defendants' real property
6 and multiple claims regarding breach of contract.

7 Attorneys' fees are available to a prevailing party pursuant to NRS 18.010:

8 In addition to the cases where an allowance is authorized by
9 specific statute, the court may make an allowance of attorney's fees to a
10 prevailing party:

11 Without regard to the recovery sought, when the court finds that
12 the claim, counterclaim, cross-claim or third-party complaint or defense
13 of the opposing party was brought or maintained without reasonable
14 ground or to harass the prevailing party. The court shall liberally
15 construe the provisions of this paragraph in favor of awarding attorney's
16 fees in all appropriate situations. It is the intent of the Legislature that
17 the court award attorney's fees pursuant to this paragraph and impose
18 sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in
19 all appropriate situations to punish for and deter frivolous or vexatious
20 claims and defenses because such claims and defenses overburden
21 limited judicial resources, hinder the timely resolution of meritorious
22 claims and increase the costs of engaging in business and providing
23 professional services to the public

24 NRS 18.010(2)(b)

25 [L]is pendens are not appropriate instruments for use in promoting
26 recoveries in actions for personal or money judgments. *Levinson v. Eighth Judicial*
27 *Dist. Court*, 109 Nev. 747, 750, 857 P.2d 18, 20 (1993).

28 The Court finds Plaintiff's claims were brought without reasonable grounds.
Plaintiff attempted to use a lis pendens as a tool to recover overdue money in an
installment contract. This was not appropriate.

1 Defendants argue they are entitled to attorneys' fees of \$68,507.20 and costs
2 of \$978.80 because they are the prevailing party in the lawsuit. Plaintiff contends
3 there is no prevailing party because she voluntarily dismissed the lawsuit and
4 therefore no attorneys' fees are available.

5 The Court finds the Defendants are the prevailing party in that her defenses
6 both succeeded in expunging the lien on the property and revealed the defects in the
7 Plaintiff's claims either because of the passage of the statutes of limitation, or
8 because of a lack of subject matter jurisdiction which resulted in a voluntary
9 withdrawal of the action in the District Court. While a claim for accrued
10 installments remains, the entire nature and circumstances of the action have
11 materially changed in light of the successful defense at the District Court level.
12 Defendant is entitled to fees for expunging the lien; all hours will be compensated,
13 but at a reduced rate of \$450 per hour consistent with practice within the firm and
14 in the community. The Court will award an additional 10 hours of time for the work
15 to related to the motions to dismiss, again at \$450 per hour, but not the entire
16 amount. The unnecessary animus expressed by the Defendants in their pleadings
17 weighs against a full award. The Court suspects that had the animus been left out,
18 the parties likely could have avoided the volume and tenor of the pleadings actually
19 filed.

20 The Court finds the following as work relating to expunging the lis pendens:

- 21 • 02/16 – 2.5 hours – Review and analyze documents
- 22 • 02/17 – 2.5 hours – Research defenses to claims and attacks on lis pendens
- 23 • 02/23 – 2.2 hours – Outline motion to expunge
- 24 • 03/02 – 2.5 hours – Research regarding lis pendens basis and lack of real
property interest
- 25 • 03/02 – 1.6 hours – commence drafting motion to expunge lis pendens
- 26 • 03/03 – 2.7 hours – Draft, revise, and edit motion to expunge
- 27 • 03/14 – 0.9 hours – Research and prepare supplement to motion to expunge
- 28 • 03/18 – 2.0 hours – Research and draft reply on motion to expunge lis
pendens
- 03/19 – 2.4 hours – edit and finalize reply on motion to expunge lis pendens
and request for submission
- 03/22 – 2.5 hours – Prepare for and attend hearing

- 03/30 – 0.6 hours – prepare order expunging lis pendens
- 04/27 – 0.4 hours – Review order; prepare notice of entry; communicate with opposing counsel regarding expunging the lis pendens
- 04/28 – 0.4 hours – Review and communicate with opposing counsel regarding release of lis pendens
- 04/29 – 0.5 hours – Various communications with opposing counsel and client regarding release of lis pendens

The total hours spent working on expunging the lis pendens was 23.7 hours.

With the additional 10 hours granted for work on the motion to dismiss, the total hours of attorneys' fees are 33.7 hours. At \$450/hour, the total award of attorneys' fees Plaintiff owes Defendants is \$15,165.

Additionally, Defendants are entitled to costs pursuant to NRS 18.020(1). Defendants request \$978.80. Defendants aver they are awaiting reimbursement from the court for an erroneous filing fee. The erroneous filing fee is \$450. Defendants request Plaintiff to pay the full costs and should Defendants be reimbursed by the court, they will return the money to Plaintiff. Plaintiff requests the filing fee not be included in a grant of costs. The Court will award Defendants costs, minus the erroneous filing fee. Thus, Plaintiff will pay Defendants costs in the amount of \$528.80.

IT IS HEREBY ORDERED Plaintiff will pay Defendants attorneys' fees totaling \$15,165 and costs totaling \$528.80.

Defendants' *Motion for an Award of Attorneys' Fees and Costs* is **GRANTED** in part and **DENIED** in part.

Plaintiff's *Motion to Retax Costs* is **GRANTED** in part and **DENIED** in part.

IT IS SO ORDERED

DATED this 1 day of October, 2021.



EGAN K. WALKER
District Judge

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STEFANIE SHARP, ESQ.
CLAYTON BRUST, ESQ.
MARK SIMONS, ESQ.
ANTHONY HALL, ESQ.
HANNAH WINSTON, ESQ.

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1 **2540**
Mark G. Simons, Esq. (SBN 5132)
2 Anthony L Hall, Esq. (SBN 5977)
SIMONS HALL JOHNSTON PC
3 6490 S. McCarran Blvd., Ste. F-46
Reno, Nevada 89509
4 Telephone: (775) 785-0088
Facsimile: (775) 785-0087
5 Email: MSimons@SHJNevada.com
AHall@SHJNevada.com

6 *Attorneys for Defendants*
7
8

9 **IN THE SECOND JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA**
10 **IN AND FOR THE COUNTY OF WASHOE**

11 KARI ANNE JOHNSON, an individual;
12
13 Plaintiffs,

CASE NO.: CV21-00246

DEPT. NO.: 7

14 v.

NOTICE OF ENTRY OF ORDER

15 MICHAEL EDWARD HATCH, an
individual; ALISHA SUZANNE HATCH, an
16 individual; and DOES I to X, inclusive

17 Defendants.
18

19 PLEASE TAKE NOTICE that an Order Regarding Attorneys' Fees and Costs was
20 entered by the Honorable Egan K. Walker on October 1, 2021, a copy of which is
21 attached hereto as **Exhibit 1**.
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AFFIRMATION: This document does not contain the social security number of any person.

DATED this 21 day of October, 2021.

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509

By: 

MARK G. SIMONS
ANTHONY L. HALL
Attorneys for Defendants

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Phone: (775) 785-0088

CERTIFICATE OF SERVICE

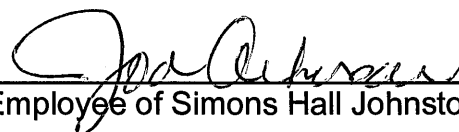
Pursuant to NRCP 5(b), I certify that I am an employee of SIMONS HALL JOHNSTON PC and that on this date I caused to be served a true copy of **NOTICE OF ENTRY OF ORDER** on all parties to this action by the method(s) indicated below:

- ☐ by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:
- ☒ I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

Kent R. Robison
Stefanie T. Sharp
Clayton P. Brust
Hannah Winston
Attorneys for Plaintiffs

- ☐ by personal delivery/hand delivery addressed to:
- ☐ by facsimile (fax) addressed to:
- ☐ by Federal Express/UPS or other overnight delivery addressed to:

DATED this 21 day of October, 2021.


Employee of Simons Hall Johnston PC

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EXHIBIT LIST

NO.	DESCRIPTION	PAGES
1	Order	5

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Phone: (775) 785-0088

EXHIBIT 1

EXHIBIT 1

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

KARI ANNE JOHNSON,

Plaintiff,

Case No.: CV21-00246

vs.

Dept. No.: 7

MICHAEL EDWARD HATCH, an
individual; ALISHA SUZANNE
HATCH, an individual; and DOES
1-X, inclusive,

Defendants.

ORDER REGARDING ATTORNEYS' FEES AND COSTS

Presently before the Court is Defendant's *Motion for an Award of Attorneys' Fees and Costs* ("the Motion"). Defendants MICHAEL EDWARD HATCH and ALISHA SUZANNE HATCH ("Defendants") filed the Motion on August 19, 2021. Plaintiff KARI ANNE JOHNSON ("Plaintiff") filed *Opposition to Motion for an Award of Attorneys' Fees and Costs* ("the Opposition") on August 27, 2021. Defendants filed *Reply in Support of Motion for Attorneys' Fees and Costs* on September 2, 2021, and contemporaneously submitted the Motion for the Court's consideration. Also before the Court is Plaintiffs *Motion to Retax Costs* ("Motion to Retax") filed on August 20, 2021. Defendants filed *Opposition to Motion to Retax* on September 2, 2021. Plaintiffs filed *Reply to Opposition to Motion to Retax Costs* on

1 September 8, 2021, and contemporaneously submitted the Motion to Retax for the
2 Courts review.

3 Having reviewed all the pleadings and related documents, the Court finds
4 and orders as follows:

5 This case involves a lis pendens attached to the Defendants' real property
6 and multiple claims regarding breach of contract.

7 Attorneys' fees are available to a prevailing party pursuant to NRS 18.010:

8 In addition to the cases where an allowance is authorized by
9 specific statute, the court may make an allowance of attorney's fees to a
10 prevailing party:

11 Without regard to the recovery sought, when the court finds that
12 the claim, counterclaim, cross-claim or third-party complaint or defense
13 of the opposing party was brought or maintained without reasonable
14 ground or to harass the prevailing party. The court shall liberally
15 construe the provisions of this paragraph in favor of awarding attorney's
16 fees in all appropriate situations. It is the intent of the Legislature that
17 the court award attorney's fees pursuant to this paragraph and impose
18 sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in
19 all appropriate situations to punish for and deter frivolous or vexatious
20 claims and defenses because such claims and defenses overburden
21 limited judicial resources, hinder the timely resolution of meritorious
22 claims and increase the costs of engaging in business and providing
23 professional services to the public

24 NRS 18.010(2)(b)

25 [L]is pendens are not appropriate instruments for use in promoting
26 recoveries in actions for personal or money judgments. *Levinson v. Eighth Judicial*
27 *Dist. Court*, 109 Nev. 747, 750, 857 P.2d 18, 20 (1993).

28 The Court finds Plaintiff's claims were brought without reasonable grounds.
Plaintiff attempted to use a lis pendens as a tool to recover overdue money in an
installment contract. This was not appropriate.

1 Defendants argue they are entitled to attorneys' fees of \$68,507.20 and costs
2 of \$978.80 because they are the prevailing party in the lawsuit. Plaintiff contends
3 there is no prevailing party because she voluntarily dismissed the lawsuit and
4 therefore no attorneys' fees are available.

5 The Court finds the Defendants are the prevailing party in that her defenses
6 both succeeded in expunging the lien on the property and revealed the defects in the
7 Plaintiff's claims either because of the passage of the statutes of limitation, or
8 because of a lack of subject matter jurisdiction which resulted in a voluntary
9 withdrawal of the action in the District Court. While a claim for accrued
10 installments remains, the entire nature and circumstances of the action have
11 materially changed in light of the successful defense at the District Court level.
12 Defendant is entitled to fees for expunging the lien; all hours will be compensated,
13 but at a reduced rate of \$450 per hour consistent with practice within the firm and
14 in the community. The Court will award an additional 10 hours of time for the work
15 to related to the motions to dismiss, again at \$450 per hour, but not the entire
16 amount. The unnecessary animus expressed by the Defendants in their pleadings
17 weighs against a full award. The Court suspects that had the animus been left out,
18 the parties likely could have avoided the volume and tenor of the pleadings actually
19 filed.

20 The Court finds the following as work relating to expunging the lis pendens:

- 21 • 02/16 – 2.5 hours – Review and analyze documents
- 22 • 02/17 – 2.5 hours – Research defenses to claims and attacks on lis pendens
- 23 • 02/23 – 2.2 hours – Outline motion to expunge
- 24 • 03/02 – 2.5 hours – Research regarding lis pendens basis and lack of real
property interest
- 25 • 03/02 – 1.6 hours – commence drafting motion to expunge lis pendens
- 26 • 03/03 – 2.7 hours – Draft, revise, and edit motion to expunge
- 27 • 03/14 – 0.9 hours – Research and prepare supplement to motion to expunge
- 28 • 03/18 – 2.0 hours – Research and draft reply on motion to expunge lis
pendens
- 03/19 – 2.4 hours – edit and finalize reply on motion to expunge lis pendens
and request for submission
- 03/22 – 2.5 hours – Prepare for and attend hearing

- 03/30 – 0.6 hours – prepare order expunging lis pendens
- 04/27 – 0.4 hours – Review order; prepare notice of entry; communicate with opposing counsel regarding expunging the lis pendens
- 04/28 – 0.4 hours – Review and communicate with opposing counsel regarding release of lis pendens
- 04/29 – 0.5 hours – Various communications with opposing counsel and client regarding release of lis pendens

The total hours spent working on expunging the lis pendens was 23.7 hours.

With the additional 10 hours granted for work on the motion to dismiss, the total hours of attorneys' fees are 33.7 hours. At \$450/hour, the total award of attorneys' fees Plaintiff owes Defendants is \$15,165.

Additionally, Defendants are entitled to costs pursuant to NRS 18.020(1). Defendants request \$978.80. Defendants aver they are awaiting reimbursement from the court for an erroneous filing fee. The erroneous filing fee is \$450. Defendants request Plaintiff to pay the full costs and should Defendants be reimbursed by the court, they will return the money to Plaintiff. Plaintiff requests the filing fee not be included in a grant of costs. The Court will award Defendants costs, minus the erroneous filing fee. Thus, Plaintiff will pay Defendants costs in the amount of \$528.80.

IT IS HEREBY ORDERED Plaintiff will pay Defendants attorneys' fees totaling \$15,165 and costs totaling \$528.80.

Defendants' *Motion for an Award of Attorneys' Fees and Costs* is **GRANTED** in part and **DENIED** in part.

Plaintiff's *Motion to Retax Costs* is **GRANTED** in part and **DENIED** in part.

IT IS SO ORDERED

DATED this 1 day of October, 2021.



EGAN K. WALKER
District Judge

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that I am an employee of the Second Judicial District Court of the State of Nevada, in and for the County of Washoe; that on the 1 day of April 2021, I electronically filed the foregoing with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

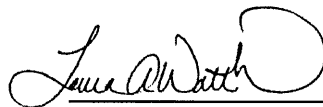
STEFANIE SHARP, ESQ.

CLAYTON BRUST, ESQ.

MARK SIMONS, ESQ.

ANTHONY HALL, ESQ.

HANNAH WINSTON, ESQ.



Laura Watts-Vial
Judicial Assistant

CASE NO. CV21-00246

KARI A. JOHNSON vs. MICHAEL E. HATCH et al.

DATE, JUDGE
OFFICERS OF

COURT PRESENT

APPEARANCES-HEARING

CONTINUED TO

03/22/2021

MOTION HEARING

HONORABLE

Hearing conducted via Zoom Video conferencing.

EGAN

Clay Brust, Esq., Stephanie Sharp, Esq., and Hannah Winston, Esq.,

WALKER

were present in Court on behalf of Plaintiff Kari Johnson, who was

DEPT. NO. 7

not present.

G. Dawson

Mark Simons, Esq. was present in Court on behalf of Defendants

K. Oates

Michael and Alisha Hatch, who were not present.

(Clerks)

This hearing was held remotely because of the closure of the courthouse at 75 Court Street in Reno, Washoe County, Nevada due to the National and Local emergency caused by COVID-19. The Court and all the participants appeared via simultaneous audiovisual transmission. The Court was physically located in Reno, Washoe County, Nevada which was the site of the court session. Counsel acknowledged Notice that the hearing was taking place pursuant to Nevada Supreme Court Rules – Part 9 relating to simultaneous audiovisual transmissions and counsel stated they had no objection to going forward in this manner.

S. Koetting

1:28 p.m. – Court convened with Court and counsel present.

(Reporter)

The Court recited a procedural history of this case to include the Motion to Dismiss being rendered moot by the filing of the Amended Complaint.

Counsel Simons, on behalf of the Plaintiff, addressed the Court and concurred with the Court as to the Motion to Dismiss.

The Court next addressed the Motion to Expunge Lis Pendens.

Counsel Simons argued in support of the Motion to Expunge Lis Pendens.

Counsel Winston, on behalf of Defendants, addressed the Court and argued in opposition to the Motion to Expunge Lis Pendens, to include the elements for the lis pendens have been satisfied.

The Court noted counsel Brust requested to be heard with the Court informing Plaintiff's counsel that only one attorney per side would be allowed to present argument.

Counsel Winston presented additional argument.

Counsel Simons presented further argument.

COURT ORDERED: The Court outlined the applicable findings in this matter to include the Plaintiff is unlikely to prevail under NRS 14.015(3) and therefore, Defendants' Motion to Expunge Lis Pendens is hereby GRANTED. Further, counsel Simons will prepare and submit the proposed order.

2:05 p.m. – Court stood in recess.

CASE NO. CV21-00246

KARI A. JOHNSON vs. MICHAEL E. HATCH et al.

DATE, JUDGE
OFFICERS OF

COURT PRESENT

APPEARANCES-HEARING

CONTINUED TO

07/08/2021

MOTIONS HEARING

HONORABLE

Hearing conducted via Zoom Video conferencing.

EGAN

Clay Brust, Esq., Stephanie Sharp, Esq., and Hannah Winston, Esq.,

WALKER

were present in Court on behalf of Plaintiff Kari Johnson.

DEPT. NO. 7

Mark Simons, Esq. was present in Court on behalf of Defendants

K. Oates

Michael and Alisha Hatch.

J. Encallado-

This hearing was held remotely because of the closure of the

Alvarez

courthouse at 75 Court Street in Reno, Washoe County, Nevada due

(Clerks)

to the National and Local emergency caused by COVID-19. The

S. Koetting

Court and all the participants appeared via simultaneous audiovisual

(Reporter)

transmission. The Court was physically located in Reno, Washoe

County, Nevada which was the site of the court session. Counsel

acknowledged Notice that the hearing was taking place pursuant to

Nevada Supreme Court Rules – Part 9 relating to simultaneous

audiovisual transmissions and counsel stated they had no objection

to going forward in this manner.

1:30 p.m. – Court convened with Court and counsel present.

The Court recited a procedural history of this case.

Counsel Winston, on behalf of the Plaintiff, addressed the Court and

advised the parties are present today to argue the Defendants'

Motion to Dismiss and Plaintiff's Motion for Leave to File Second

Amended Complaint. Further, counsel argued in support of Plaintiff's

Motion for Leave to File Second Amended Complaint and in

opposition to Defendants' Motion to Dismiss.

The Court addressed the deficiencies associated with the First

Amended Complaint.

Counsel Winston responded as to the deficiencies, including subject

matter jurisdiction, and that those deficiencies can be remedied in

the Second Amended Complaint if the Court grants the Plaintiff's

Motion.

Counsel Simons, on behalf of the Defendants, addressed the Court

and argued in support of the Defendants' Motion to Dismiss and in

opposition to the Plaintiff's Motion for Leave to File Second Amended

Complaint. Further, counsel Simons argued the Second Amended

Complaint should not be filed and that subject matter jurisdiction is

lacking.

Counsel Winston responded, presented additional argument, and

further advised the Plaintiff objects to the Defendants' request for

judicial notice, or the documents attached thereto.

COURT ORDERED: The Plaintiff's First Amended Complaint is DISMISSED, and Plaintiff's Motion for Leave to File Second Amended Complaint is GRANTED. Further, the Defendants' Motion to Dismiss is DENIED, however, leave shall be extended to refile the Motion to Dismiss after the Second Amended Complaint has been filed.

Counsel Winston to prepare and submit the proposed order to the Court.

2:32 p.m. – Court stood in recess.

Code 1350

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

KARI ANNE JOHNSON, an individual,

Plaintiffs,

Case No. CV21-00246

vs.

Dept. No. 7

**MICHAEL EDWARD HATCH, an individual;
ALISHA SUZANNE HATCH, an individual;
and DOES 1-X, inclusive,**

Defendants.

CERTIFICATE OF CLERK AND TRANSMITTAL – NOTICE OF APPEAL

I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe; that on the 28th day of October, 2021, I electronically filed the Notice of Appeal in the above entitled matter to the Nevada Supreme Court.

I further certify that the transmitted record is a true and correct copy of the original pleadings on file with the Second Judicial District Court.

Dated this 28th day of October, 2021.

Alicia L. Lerud
Clerk of the Court
By /s/Y.Viloria
Y.Viloria
Deputy Clerk

Code 4132

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

KARI ANNE JOHNSON, an individual,

Case No. CV21-00246

Plaintiffs,

Dept. No. 7

vs.

**MICHAEL EDWARD HATCH, an individual;
ALISHA SUZANNE HATCH, an individual;
and DOES 1-X, inclusive,**

Defendants.

NOTICE OF CROSS-APPEAL DEFICIENCY

TO: Clerk of the Court, Nevada Supreme Court,
and All Parties or their Respective Counsel Of Record:

On October 27th, 2021, Kent. R. Robison, Esq., for Plaintiff, Kari Anne Johnson, filed a Notice of Cross-Appeal with the Court. Attorney Robison failed to include the Two Hundred Fifty Dollar (\$250.00) Supreme Court filing fee.

Pursuant to NRAP 3(a)(3), on October 28th, 2021, the Notice of Cross-Appeal was filed with the Nevada Supreme Court. By copy of this notice Attorney Robison, was apprised of the deficiency by electronic mail.

Dated this 28th day of October, 2021.

Alicia L. Lerud
Clerk of the Court
By: /s/Y.Viloria
Y.Viloria
Deputy Clerk

CERTIFICATE OF SERVICE

CASE NO. CV21-00246

I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County Of Washoe; that on the 28th day of October, 2021, I electronically filed the Notice of Cross-Appeal Deficiency with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

STEFANIE SHARP, ESQ. for KARI ANNE JOHNSON

CLAYTON BRUST, ESQ. for KARI ANNE JOHNSON

MARK SIMONS, ESQ. for ALISHA SUZANNE HATCH et al

KENT ROBISON, ESQ. for KARI ANNE JOHNSON

ANTHONY HALL, ESQ. for ALISHA SUZANNE HATCH et al

HANNAH WINSTON, ESQ. for KARI ANNE JOHNSON

Deposited in the Washoe County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada:

By:/s/Y.Viloria

Y.Viloria

Deputy Clerk